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Via ECF and Hand Delivery

December 21, 2018

The Honorable George B. Daniels
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001
03 MDL 1570 (GBD) (SN)

Dear Judge Daniels and Judge Netburn:

We represent the Plaintiffs who commenced actions on December 18, 2018 by adopting the Saudi Arabia Short Form Complaint and asserting the factual and jurisdictional allegations from the Consolidated Amended Saudi Arabia Complaint.

Pursuant to Judge Netburn's Order dated July 10, 2018, docketed under the MDL as Docket Number 4045 ("July 10, 2018 Order"), we respectfully request that the following¹ cases be made part of this MDL.²

1. *Abel, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv- 11880 (Exhibit 1)
2. *Bonomo, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11885 (Exhibit 2)
3. *Cintron-Lugos, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11888 (Exhibit 3)
4. *DeConto, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv- 11904 (Exhibit 4)
5. *Lang, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv- 11926 (Exhibit 5)

¹ Copies of the pleadings and Statements of Relatedness are attached to this letter as exhibits.

² We also represent the plaintiffs in the putative class action *Estate of John P. O'Neill, Sr. et al. v. Kingdom of Saudi Arabia, et al.*, 04-1922 (GBD) (SN).

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6. *Gordenstein, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11941 (Exhibit 6)
7. *Harris, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11946 (Exhibit 7)
8. *Garger, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11950 (Exhibit 8)
9. *Bush, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11964 (Exhibit 9)
10. *Mercer, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11965 (Exhibit 10)
11. *Murray, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11966 (Exhibit 11)
12. *Perez, et al. v. Kingdom of Saudi Arabia*,
Case Number: 1:18-cv-11967 (Exhibit 12)
13. *Richards, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11969 (Exhibit 13)
14. *Rooney, et al. v. Kingdom of Saudi Arabia*;
Case Number: 1:18-cv-11970 (Exhibit 14)
15. *Spence, et al. v. Kingdom of Saudi Arabia*,
Case Number: 1:18-cv-11971 (Exhibit 15)

We anticipate filing additional complaints next week. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Jerry S. Goldman
Jerry S. Goldman, Esquire

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*Attorney for the Plaintiffs in the above-listed
cases (along with the plaintiffs in 04-civ-
1922, the "O'Neill Plaintiffs")*

cc: All MDL Counsel of Record (via ECF, without enclosures)
Encl.